

**THE GOUGH LAW FIRM, LLP**

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*Attorneys for Movant Pao Kue and Proposed Liaison Counsel for the Class*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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CREIGHTON TAKATA, Individually and on behalf of all others similarly situated, : Civil No. 3:18-CV-02293(FLW)(TJB)  
Plaintiff, :  
v. :  
RIOT BLOCKCHAIN, INC. F/K/A, : **DECLARATION OF DEBORAH R.**  
BIOPTIX, INC., JOHN O'ROURKE, and : **GOUGH IN SUPPORT OF MOTION**  
JEFFREY G. MCGONEGAL, : **OF PAO KUE FOR APPOINTMENT**  
Defendants. : **AS LEAD PLAINTIFF AND**  
: **APPROVAL OF SELECTION OF**  
: **COUNSEL**  
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I, Deborah R. Gough, hereby declare as follows:

1. I am an attorney at law of the State of New Jersey, and a member of The Gough Law Firm, LLP (“Gough”), attorneys for Pao Kue (“Kue”). I have personal knowledge of the facts set forth herein. I make this Declaration in support of the motion by Kue for appointment as Lead Plaintiffs for the Class and approval of Kue’s selection of Gibbs Law Group LLP (“Gibbs”) and Milberg Tadler Phillips Grossman LLP (“Milberg Tadler”) as Lead Counsel and Gough as Liaison Counsel.

2. Attached hereto as the exhibits indicated are true and correct copies of the following:

Exhibit A: Press release published on *Business Wire* on February 23, 2018, announcing the pendency of the above-captioned action;

Exhibit B: Sworn Shareholder Certification executed by Kue;

Exhibit C: Loss Chart of Kue;

Exhibit D: Firm resume of Gibbs;

Exhibit E: Firm resume of Milberg Tadler; and

Exhibit F: Firm profile of Deborah R. Gough.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed on April 18, 2018, at Hackensack, New Jersey.

*/s/ Deborah R. Gough*  
Deborah R. Gough